WISCONSIN DEPARTMENT OF
Public Instruction

Jill K. Underly, PhD, State Superintendent

June 1, 2023

Chairperson Rebecca Cameron Valcq
Public Service Commission of Wisconsin
State of Wisconsin

Re: Broadband and Digital Equity Planning   5-BP-2023

Dear Chairperson Valcq,

The Wisconsin Department of Public Instruction (DPI) represents the students of Wisconsin and their families. As the state agency that oversees public libraries, we represent all people who live in the state because every resident has access to public library services. We have a special interest in broadband and digital equity because access to the internet in every home is indispensable for all students, and providing unrestricted access to information, in print or electronic formats, lies at the heart of every library's mission. Therefore, on behalf of our schools and libraries, especially where access to the internet is concerned…DPI advocates for everyone in the state.

We thank the PSC for this opportunity to highlight several of DPI's existing activities related to broadband expansion and digital equity, and to provide input on agency needs related to digital equity and broadband infrastructure expansion.

Digital Equity Data Collection

In 2020, DPI developed and released a series of five digital equity questions that schools could use to gather detailed information about student access to devices and broadband services.[1] Wisconsin schools are now in the third year of this digital equity data collection. DPI continues to support schools with analyzing the digital equity data to help meet student needs.

During the 2022-23 school year, 338 out of 421 school districts reported digital equity data to DPI. The collection of these data found that some students lacked internet access because of affordability or availability of service. Of those students who reported having internet access where they live, several households responded that they could not stream video for learning at all or without quality interruptions. The data showed that traditionally marginalized student groups were more likely to lack internet access.

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[1] https://dpi.wi.gov/broadband/internet-access-home-survey

DPI built a publicly available Digital Equity Dashboard to view and analyze the statewide aggregated digital equity data.[2] In conjunction with the publicly available dashboard, DPI built secure dashboards for schools to use to address individual student connectivity needs.

DPI also built publicly available Digital Equity Maps to view data by individual school districts.[3] In addition, the department created two primary datasets that populated the Digital Equity Maps and dashboards. These are: (1) broadband access, and (2) broadband reliability. The data are given as the percentage of student respondents in each district.

These maps are used by districts to advocate and plan for broadband investments in their community. In some cases, local broadband expansion groups have requested aggregated digital equity data by county to contribute to their local needs assessment efforts. Twenty-one organizations have contacted DPI to review digital equity data as part of their broadband expansion planning efforts. Several school districts have used their digital equity data to provide letters of support for PSC broadband expansion grant applications.

DPI continues to support schools with analyzing digital equity data. Collecting data about access and affordability of both devices and adequate internet bandwidth has enabled DPI to develop data driven systems-level solutions that facilitate both immediate and long-term actions to help individuals and families. Closing the digital equity gap is a priority to ensure high-quality learning for all children in Wisconsin through access to robust broadband and digital learning resources, especially in rural areas and for other groups lacking affordable or adequate internet access.

BEAD and Digital Equity Plan Recommendations

We greatly appreciate the Wisconsin Public Service Commission's (PSC) commitment to digital equity, and the statewide leadership it has taken on this issue. We thank the PSC for encouraging local broadband planning groups to include K-12 schools, library systems, and libraries in local broadband and digital equity planning efforts. DPI is an active member of the PSC's Broadband Stakeholders Group, its Digital Equity and Inclusion Stakeholders Group, and the Governor's Task Force on Broadband Access. The work of these groups will be especially important for sustainability of the federal BEAD and Digital Equity plans, beyond the initial infusion of federal funding. In moving forward, we submit these recommendations now to encourage the PSC to establish rules regarding the disbursement of BEAD funding that will uphold this commitment. In addition, we present recommendations for the state's digital equity plan.

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[2] https://dpi.wi.gov/wisedash/districts/about-data/digital-equity

[3] https://student-internet-access-wi-dpi.hub.arcgis.com/

Specifically, we urge the State of Wisconsin, through the PSC, to

> 1. Require BEAD recipients to provide high-speed internet access at $30/month maximum to customers who qualify for the federal Affordable Connectivity Program (ACP).

> 2. Install fiber to connect our K-12 schools and public libraries that currently lack 1GB fiber connections.

> 3. Classify schools and libraries with less than 100/20 service as "underserved" and thus qualify for funding in this category.

> 4. Support funding for an internet-accessible device for every student and devices for library patron checkout.

> 4. Support funding for Wi-Fi on school buses.

> 6. Provide open education resources to support digital skills education.

More information on each of these six recommendations is provided below.

1. **Require BEAD recipients to provide high-speed internet at $30/month to customers who qualify for the ACP**

The BEAD program is designed to fund the expansion of high-speed internet infrastructure across the state and country. It is not primarily focused on making internet access affordable to low-income residents. However, because under BEAD statutory language, the PSC must require recipients of BEAD funding to offer discounted internet service to low-income residents, and the PSC has the authority to define discounted rates.
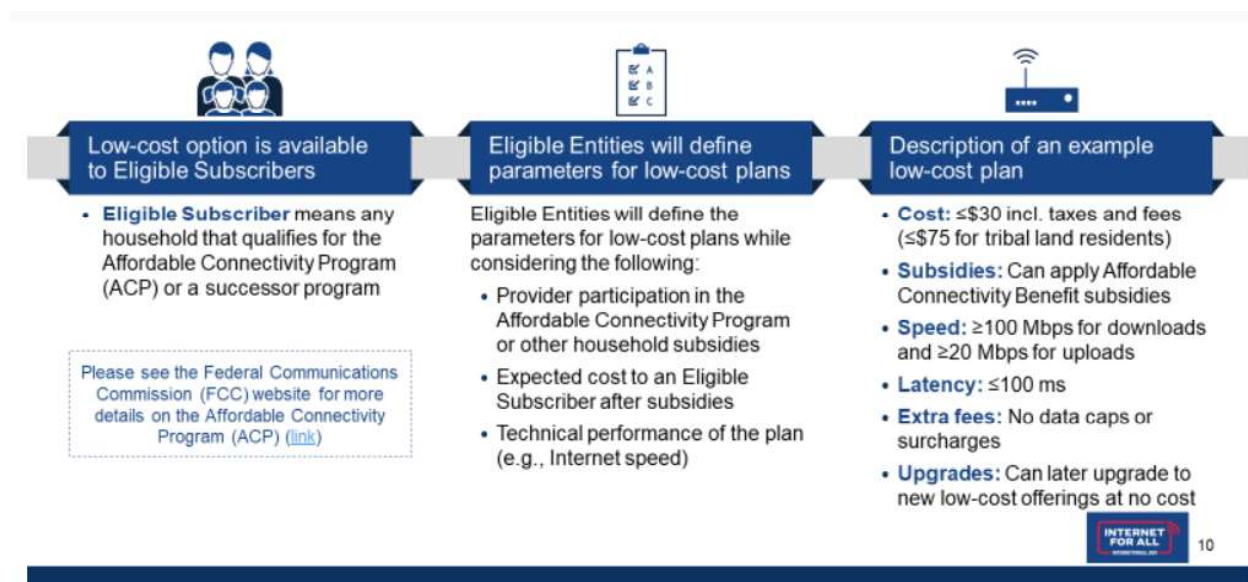
Because of this requirement, the BEAD program rules support broadband affordability as well as availability. We urge the Public Service Commission to use its authority to establish BEAD funding rules that make internet service genuinely affordable to everyone served by a BEAD-funded provider. We believe that doing anything less would be a step back from the commitment to digital equity that the state has embraced.

For purposes of the BEAD program, the DPI urges the PSC to define low-cost internet service as follows:

- Provider participates in ACP or any successor program.
- Provider offers at minimum 100 Mbps download and 20Mbps upload.
- Provider offers such service at $30 or less/month.
- Internet service is provided with no data caps or surcharges.
- Upgrades to new, low-cost service offerings at no cost.

We do not believe these requirements are radical suggestions. Moreover, an Internet for All presentation (see example below) provides exactly these terms in its example of a low-cost plan. They are the same terms that 20 leading internet providers currently offer, in conjunction with the ACP. We are proposing a mainstream definition of "low-cost," and one that NTIA itself endorses. Internet for All's example is below:

At DPI, we see the BEAD program as a golden opportunity to make high-speed internet available and affordable to our constituents -- students, families, library patrons, and every person in Wisconsin—especially in areas that still have slow or no service. More than three decades after the creation of the world wide web, we now have the opportunity to close the connectivity gap.

PSC recognizes that internet access is a civil right. As well, internet service is not available, if people cannot afford it. By setting Wisconsin's program rules as we have suggested, BEAD funding helps to close two major gaps by making service available everywhere and by making it affordable to everyone.

This is what it will take to make BEAD a program that promotes genuine digital equity, and to affirm Wisconsin's commitment to equity for all students. We urge the Commission to fully leverage this great opportunity.

2. **Install fiber to connect our K-12 schools and public libraries that currently lack 1GB fiber connections.**

The IIJA BEAD funding states that after prioritizing connecting unserved and underserved locations, funding can be competitively awarded to "connect eligible community anchor institutions..." (IIJA section 60102, (h)(1)(A)(i)(III)). Assuming there is funding available for CAI connectivity, we request that priority be given to connect our state's K-12 schools and public

libraries that still need fiber connectivity to reach the BEAD benchmark of gigabit level broadband service. Fortunately, over 98% of our K-12 schools and public libraries already have fiber broadband connectivity. However, DPI has documented that approximately 10 schools and 20 public libraries still need fiber connectivity (see appendix below). We hope the PSC will prioritize BEAD funding to get these underserved schools and libraries the high-speed gigabit connectivity they need to meet the needs of students, patrons, and staff. Considering there are only 30 sites that still need fiber, we think this is a very modest and realistic request.

3. **Classify schools and libraries with less than 100/20 service as "underserved" and thus qualify for funding in this category.**

The IIJA BEAD funding gives priority to connecting unserved locations first, and then connecting underserved locations (IIJA section 60102, (h)(1)(A)(i)(II)). Assuming there is funding available for this second priority, we ask that the PSC allocate funding for our schools and libraries that now have less than 100 Mbps download and 20Mbps upload. The DPI estimates that there are approximately 210-230 schools and libraries that currently have less than 100Mbps.

4. **Funding for an internet-accessible device for every student and devices for library patron checkout**

Broadband access is not enough, every student also needs access to an internet connected device (1:1 connectivity). Over the past several years schools have been able to use federal ESSER (Elementary and Secondary School Emergency Relief Fund) grants to support efforts aligned with Digital Equity program priorities and purchase mobile devices and internet access for each student. However, this funding source is ending by September 30, 2024. In addition, Wisconsin schools and libraries received federal Emergency Connectivity Funding (ECF) to purchase both devices and internet service for library patrons and students. This ECF funding will end June 30, 2024. With these other funding sources terminating, we hope the PSC will advance Digital Equity efforts to provide for a mobile device to each student and devices for library patron check-out.

5. **Funding for Wi-Fi on school busses**

Students in many Wisconsin school districts live in areas with low cellular coverage and limited internet connectivity options. Providing internet access to students on school buses during their trips to and from school can provide time for students without internet access where they live to do homework and access digital materials. Buses can also be parked and used as hotspots when not transporting students. There are technical solutions for Wi-Fi on buses that allow for constant mobile internet connectivity, even in low-coverage areas, with the ability to connect to multiple cellular networks and transition seamlessly between them as they go in and out of range. The equipment may be purchased or leased from a commercial service provider. There are monthly recurring costs to obtain the Wi-Fi service and there may also be one-time costs such as activation and installation fees. We hope the PSC will prioritize Digital Equity funding for Wi-Fi on school buses.

6. Provide open education resources to support digital skills education

Digital skills education, including data privacy and staying safe online, are important components of Digital Equity and necessary to help individuals take full advantage of broadband and device access. Wisconsin's libraries have experience with offering classes for patrons to build digital skills. We hope the PSC will consider ways to make digital skills materials accessible through open educational resources, including supplemental materials for special populations including first language support for English Learners. The advantage of open educational resources is that they allow for the materials to be used, reused, adapted, shared and modified according to specific needs because they are published under open use licenses (e.g., Creative Commons).

In summary, our schools and libraries can be valuable partners in working with the various organizations who will seek DE and BEAD planning funds from the Commission. From a DPI perspective, we look forward to continuing our close relationship with the Commission.

Sincerely,

Lucas Munz, Chief Information Officer
Wisconsin Department of Public Instruction

Appendix: Wisconsin Public Libraries and Schools without Fiber

Library System	Library	Address
Manitowoc County	Brillion Public Library	326 N. Main St., Brillion, WI 54110
Winnefox	Ethel Everhard Memorial Library	117 E. 3rd St., Westfield, WI 53964
	Brandon Public Library	117 E. Main St., Brandon, WI 53919
Indianhead	Fairchild Public Library	208 Huron St., Fairchild, WI 54741
	Hawkins Area Library	709 Main St., Hawkins, WI 54530
	Ogema Public Library	W5005 State Rd. 86, Ogema, WI 54459
	Cadott Community Library	331 N. Main St., Cadott, WI 54727
	Colfax Public Library	613 Main St., Colfax, WI 54730
	Thomas St. Angelo Public Library	1305 2nd Ave., Cumberland, WI 54829
	Geraldine E. Anderson Village Library	117 S. Central Ave., Dresser, WI 54009
	Elk Mound Branch	E 101 Menomonie St., Elk Mound, WI 54739
	Rusk County Community Library	418 Corbett Ave. W., Ladysmith, WI 54848
	D.R. Moon Memorial Library	154 4th Ave., Stanley, WI 54768
	St. Croix Falls Public Library	230 S. Washington St., St. Croix Falls, WI 54024
Wisconsin Valley	Edgar Branch	224 S. Third Ave., Edgar, WI 54426
	Marathon Branch	515 Washington St., Marathon, WI
	Joseph Dessert Branch	123 Main St., Mosinee, WI 54455
	Spencer Branch	105 Park St., Spencer, WI 54479
	Stratford Branch	213201 Scholar St., Stratford, WI 54484
Southwest	Montfort Public Library	102 E. Park St., Montfort, WI
	Allen-Dietzman Public Library	220 W. Barber Ave., Livingston, WI 53554
	Dwight T. Parker Public Library	925 Lincoln Ave., Fennimore, WI 53809
	Gays Mills Public Library	16381 State Hwy. 131, Ste. 2, Gays Mills, WI 54631
Winding Rivers	De Soto Public Library	111 S. Houghton St., De Soto, WI 54624
	Hauge Memorial Library	50655 Charles St., Osseo, WI 54758

	Readstown Public Library	129 W. Wisconsin Ave., Readstown, WI 54652
School District	**School**	**Address**
Horicon	Van Brunt El	611 Mill St Horicon WI 53032-1461
Lake Mills	Lake Mills Mid	318 College St, Lake Mills, WI 53551
Mauston	Lyndon Station El	200 Hoehn Dr, Lyndon Station, WI 53944
Mukwonago	Eagleville Charter School	S101 W34511 Hwy LO Eagle WI 53119
Plymouth	Fairview El	300 Salem Dr, Plymouth, WI 53073
Poynette	Arlington El	307 Bullen Road, Arlington, WI 53911
Reedsville	Reedsville Elementary/Middle	350 Park St, Reedsville, WI 54230
Saint Croix Falls	Dresser El	131 W 2nd St, Dresser, WI 54009
Shorewood	Atwater El	2100 E Capitol Dr Shorewood WI 53211-2198
Shorewood	Lake Bluff El	1600 E Lake Bluff Blvd Shorewood WI 53211-1599
Whitefish Bay	Richards El	5812 N Santa Monica Blvd Whitefish Bay WI 53217-4699
Dover J1	Kansasville El	4101 S Beaumont Ave Kansasville WI 53139-9517
Downtown Montessori	Downtown Montessori	2507 S Graham St Milwaukee WI 53207-1687
Rocketship Southside Comm Prep	Rocketship Southside Comm Prep	3003 W Cleveland Ave Milwaukee WI 53215
Yorkville J2	Yorkville El	18621 Washington Ave Union Grove WI 53182-9600